

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ABIGAIL MULLEN,	)	Civil Action No. 2:20-cv-02020
	)	
Plaintiff,	)	Honorable J. Nicholas Ranjan
	)	
v.	)	
	)	<i>ELECTRONICALLY FILED</i>
MSA SAFETY PITTSBURGH	)	
MANUFACTURING, LLC,	)	
	)	JURY TRIAL DEMANDED
Defendant.	)	

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Plaintiff, Abigail Mullen, and Defendant, MSA Safety Pittsburgh Manufacturing, LLC, hereby move this Court to enter a protective order, and in support thereof, state as follows:

1. This Court entered a Case Management Order on May 7, 2021 following its Initial Case Management Conference. Doc. No. 16.
2. In that Order, the Parties were directed to file a joint motion for entry of a protective order by May 14, 2021. Id.
3. Since that time, the Parties have conferred and agreed-on the Stipulated Protective Order attached to this Motion.
4. Accordingly, the Parties request that the Court grant this Motion and enter the Stipulated Protective Order.

Dated: May 14, 2021

Respectfully submitted,

MANES & NARAHARI, LLC

JACKSON LEWIS P.C.

/s/ David M. Manes

David M. Manes, Esquire

/s/ Laura C. Bunting

Marla N. Presley, Esquire

PA ID No. 314661  
Law and Finance Building  
429 Fourth Avenue, Ste 300  
Pittsburgh, PA 15219  
(412) 626-5570 - Telephone  
(412) 650-4845 – Fax

dm@manesnarahari.com

*Counsel for Plaintiff*

PA ID No. 91020  
Laura C. Bunting, Esquire  
PA ID No. 307274  
Jackson Lewis P.C.  
1001 Liberty Avenue, Suite 1000  
Pittsburgh, Pennsylvania 15222  
(412) 232-0404 - Telephone  
(412) 232-3441 – Fax

marla.presley@jacksonlewis.com  
laura.bunting@jacksonlewis.com

*Counsel for Defendant*